

EXHIBIT E

[Welch Declaration w/Exs. (5 Pages)]

BINGHAM MCCUTCHEN LLP
DONN P. PICKETT (SBN 72257)
FRANK M. HINMAN (SBN 157402)
SUJAL J. SHAH (SBN 215230)
SUSAN J. WELCH (SBN 232620)
FRANK BUSCH (SBN 258288)
Three Embarcadero Center
San Francisco, CA 94111-4067
Telephone: 415.393.2000
Facsimile: 415.393.2286
donn.pickett@bingham.com
frank.hinman@bingham.com
sujal.shah@bingham.com
susan.welch@bingham.com
frank.busch@bingham.com

Attorneys for Defendant
Intel Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF SUSAN J. WELCH IN
SUPPORT OF DEFENDANTS' MOTION TO
STRIKE THE REPORT OF DR. EDWARD
E. LEAMER**

1 I, Susan J. Welch, declare:

2 1. I am an attorney duly licensed to practice law in the State of California, and a
3 counsel at the firm of Bingham McCutchen LLP, attorneys for Defendant Intel Corporation
4 (“Intel”). I make this declaration based on my own personal knowledge. If called upon to
5 testify, I could and would testify competently to the truth of the matters stated herein.

6 2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
7 deposition transcript of plaintiffs’ expert Edward Leamer, taken on October 26, 2012 in this
8 matter.

9 3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
10 deposition transcript of plaintiff Mark Fichtner, taken on October 15, 2012 in this matter.

11 4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
12 deposition transcript of plaintiff Michael Devine, taken on October 24, 2012 in this matter.

13 5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
14 deposition transcript of plaintiff Siddarth Hariharan, taken on October 12, 2012 in this matter.

15 6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the
16 deposition transcript of plaintiff Brandon Marshall, taken on October 22, 2012 in this matter.

17 7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the
18 deposition transcript of plaintiff Daniel Stover, taken on October 29, 2012 in this matter.

19 8. Attached hereto as Exhibit G is a true and correct copy of an article by Dr.
20 Leamer published in the American Economics Review, titled *Let’s Take the Con Out of*
21 *Econometrics*.

22 9. Attached hereto as Exhibit H is a true and correct copy of an article by Dr.
23 Leamer published in the Journal of Economic Perspectives, titled *Tantalus on the Road to*
24 *Asymptopia*.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 this 12th day of November in San Francisco, California.

3
4
5 By: /s/ Susan J. Welch
Susan J. Welch

6
7 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
8 the filing of this document has been obtained from all signatories.

9
10 /s/ Frank M. Hinman
Frank M. Hinman

**Exhibits A through F
filed under seal**